

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
FLORENCE JAMES : **VIOLATIONS:**
: **18 U.S.C. § 1341 (mail fraud - 1 count)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

THE DEFENDANT

1. Defendant FLORENCE JAMES was a paramedic who worked for American Para Professional Services (APPS), a medical services company located in Collingdale, Pennsylvania. As part of her employment, she conducted medical screenings for life insurance companies as part of the application process for term life insurance policies. She visited applicants at home or work, obtained vital signs, documented medical history and other personal information, and drew a blood sample.

2. Robert Mitchell, charged elsewhere, was a 40-year old, healthy, non-smoker, who lived and worked in Philadelphia.

3. North American Life & Health Company, located in Chicago, Illinois, was a business involved in issuing life insurance policies to qualified applicants.

THE VICTIMS

4. Insurance companies issue life insurance policies to individuals based on numerous criteria, including but not limited to age, physical condition, and whether the individual is a smoker.

5. Insurance companies routinely require individuals seeking life insurance to submit to a medical examination to assist their determination of (1) whether the individual will be issued a policy, and if so, (2) how much of a premium will be charged for the policy, and (3) the amount of life insurance coverage under the policy.

6. Medical screeners are employed by life insurance companies to perform the medical examination, which includes drawing blood from the policy applicant. The blood is mailed to a laboratory for analysis and the analysis results are mailed to the relevant insurance company for evaluation and use in processing the life insurance application.

THE SCHEME

7. From in or about April 2000 to in or about October 2002, defendant FLORENCE JAMES and Robert Mitchell devised and intended to devise a scheme to defraud various life insurance companies and to obtain money and property by mean of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

8. Robert Mitchell received payment from various individuals who desired to obtain insurance policies for family members who were elderly, in poor physical condition or smokers.

9. Robert Mitchell posed as the policy applicant at medical examinations, where he provided blood, forged documents and falsely represented himself as the actual

individual seeking to obtain life insurance.

10. Unbeknownst to her employer APPS, defendant FLORENCE JAMES received payment from Robert Mitchell to falsely document the medical condition of applicants during the application process for life insurance policies.

11. Defendant FLORENCE JAMES, on numerous occasions, drew Robert Mitchell's blood for the purpose of satisfying the requirement that each applicant receive a medical examination because Mitchell would successfully pass the medical examination and the actual policy applicant would not or would be subject to very high premiums due to age or poor health.

12. Robert Mitchell mailed and caused to be mailed fraudulent life insurance policy applications and other fraudulent documents to various life insurance companies in the United States.

13. Defendant FLORENCE JAMES mailed blood samples drawn from Robert Mitchell to laboratories for testing. Defendant JAMES fraudulently submitted these blood samples as blood taken by her from the life insurance applicants. The results of such tests were routinely mailed or shipped by interstate commercial carrier to relevant insurance companies as part of the life insurance application process.

14. On various occasions between in or about April 2000 and in or about October 2002, defendant FLORENCE JAMES assisted Robert Mitchell in obtaining or attempting to obtain at least 25 life insurance policies for paying customers through these various fraudulent methods.

15. On or about January 4, 2001, defendant FLORENCE JAMES drew Robert Mitchell's blood knowing Mitchell was posing as life insurance applicant B.S. at a medical

examination.

16. On or about January 4, 2001, in the Eastern District and elsewhere,
defendant

FLORENCE JAMES,

for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered by commercial interstate carrier a package sent from Philadelphia, Pennsylvania Lab One, P.O. Box 12035, Shawnee Mission, Kansas 66201-9952, which contained the blood drawn from Robert Mitchell and falsely purported to be the blood of B.S., whose life insurance application was pending with North American Life & Health Company.

In violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
United States Attorney